

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF RUSSELL H.
FALCONER IN SUPPORT OF
FACEBOOK, INC.'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

I, Russell H. Falconer, hereby declare as follows:

1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bar of Texas. I submit this declaration in support of Facebook’s Administrative Motion To Consider Whether Another Party’s Material Should Be Sealed. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. A true and correct **redacted** copy of the Declaration of Deborah Stein In Support of Opposition Of Facebook, Inc., Gibson, Dunn & Crutcher LLP, And Orin Snyder To Plaintiffs’ Motion For Sanctions (“Stein Declaration”) is attached hereto.

3. A true and correct **unredacted** copy of the Stein Declaration is attached hereto.

4. A true and correct **redacted** copy of **Exhibit 41** to the Stein Declaration is attached hereto.

5. A true and correct **unredacted** copy of **Exhibit 41** to the Stein Declaration is attached hereto.

6. A true and correct **unredacted** copy of **Exhibit 43** to the Stein Declaration is attached hereto.

Executed on April 11, 2022 in Dallas, Texas.

/s/ Russell H. Falconer

Russell H. Falconer